

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MICHAEL MEYERS, *et al.*, individually  
and on behalf of all others similarly  
situated,

Plaintiffs,

v.

BHI ENERGY SERVICES, LLC and BHI  
ENERGY I SPECIALTY SERVICES  
LLC,

Defendants.

Lead Case No.: 1:23-cv-12513-LTS

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,  
COSTS, EXPENSES, AND SERVICE AWARDS**

PLEASE TAKE NOTICE that Plaintiffs, on behalf of themselves, and on behalf of all others similarly situated, upon the accompanying Memorandum of Law in Support Plaintiffs' Motion for Attorneys' Fees, Costs, Expenses, and Service Awards, the Declaration of William B. Federman in Support of Plaintiffs' Motion for Attorneys' Fees, Costs, Expenses, and Service Awards, and all prior pleadings and proceedings had herein, Plaintiffs move this Court for entry of an Order awarding: (i) attorneys' fees in the amount of \$500,000.00; (ii) reimbursement of costs and expenses in the amount of \$18,370.78; and (iii) Service Awards to the Class Representatives in the amount of \$2,500.00 each.<sup>1</sup>

Dated: January 28, 2025

Respectfully submitted,

/s/ William B. Federman

William B. Federman

(admitted *pro hac vice*)

**FEDERMAN & SHERWOOD**

10205 N. Pennsylvania Ave.

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<sup>1</sup> A proposed order will be submitted with Plaintiffs' forthcoming Motion for Final Approval of Class Action Settlement.

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*Settlement Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 28, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ William B. Federman  
William B. Federman